

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

2019 JUL 16 P 3 15

UNITED STATES OF AMERICA,

STEPHEN C. DRIES
CLERK

Plaintiff,

v.

Case No. 19-CR-
[18 U.S.C. §§ 641 & 1343]

19-CR-131

ANGELA M. JUST,

Defendant.

INDICTMENT

THE GRAND JURY CHARGES THAT:

Allegations Common to All Counts

1. From on or about March 1, 2016, through on or about August 31, 2018, in the State and Eastern District of Wisconsin,

ANGELA M. JUST

knowingly devised and participated in a scheme to defraud and to obtain money by means of material false and fraudulent pretenses and representations.

2. The Social Security Administration (SSA), an agency of the United States, administers the payment of benefits from the United States of America to qualifying individuals including Title II Retirement and Survivor Insurance benefits.

3. The Department of Veterans Affairs (VA), an agency of the United States, administers the payment of benefits to qualifying individuals, including VA Death Pension benefits.

4. As an individual entitled to receive SSA benefits, P.J., the defendant's mother, was a recipient of Title II Retirement and Survivor Insurance Benefits. The SSA made monthly wire transfer direct deposits in the amount of \$900 to a U.S. Bank checking account, ending in 3514, an account shared by P.J. and the defendant, Angela M. Just.

5. As a widow of a veteran entitled to receive VA benefits, P.J. was also a recipient of a Death Pension benefit. The VA made monthly wire transfer direct deposits ranging between \$1,149 and \$1,176 into a U.S. Bank checking account, ending in 3514.

6. On or about February 28, 2016, P.J. died. As a result, her SSA and VA benefits terminated.

7. Defendant Angela M. Just failed to notify the SSA and VA of P.J.'s passing.

8. After P.J.'s death, the SSA continued to make monthly wire transfer direct deposits into the US Bank checking account ending in 3514. Between March 16, 2016, and August 31, 2018, Angela M. Just unlawfully converted approximately \$27,000 in SSA benefits, to which she knew was not entitled.

9. After P.J.'s death, the VA continued to make monthly wire transfer direct deposits into the U.S. Bank checking account ending in 3514. Between March 1, 2016, and August 31, 2018, Angela M. Just unlawfully converted approximately \$35,000 in VA benefits, to which she knew she was not entitled.

COUNTS ONE THROUGH THREE

THE GRAND JURY FURTHER CHARGES THAT:

Executions of the Scheme to Defraud

10. On or about the dates listed below, at Milwaukee, in the State and Eastern District of Wisconsin,

ANGELA M. JUST,

for the purpose of executing the scheme to defraud and to obtain money by material false and fraudulent pretenses and representations, caused to be transmitted in interstate commerce by means of a wire communication certain writings, signs, and signals in the form of an electronic funds transfer from an account in New Jersey, to the U.S. Bank checking account ending in 3514, in Wisconsin.

Count	Date of Transfer	Transferee Bank	Amount Transferred
One	June 1, 2016	US Bank (RTN: 075000022)	\$1,149
Two	June 1, 2017	US Bank (RTN: 075000022)	\$1,153
Three	June 1, 2018	US Bank (RTN: 075000022)	\$1,176

All in violation of Title 18, United States Code, Section 1343.

COUNTS FOUR THROUGH SIX

THE GRAND JURY FURTHER CHARGES THAT:

11. On or about the dates listed below, in the State and Eastern District of Wisconsin,

ANGELA M. JUST

did willfully and knowingly embezzle, steal, and convert to her use more than \$1,000 of money of the VA; namely, widow's benefits for her deceased mother, P.J., to which she knew she was not entitled.

Count	Date	Amount
Four	July 1, 2016	\$1149
Five	June 30, 2017	\$1153
Six	June 29, 2018	\$1176

All in violation of Title 18, United States Code, Section 641.

COUNTS SEVEN THROUGH NINE

THE GRAND JURY FURTHER CHARGES THAT:

12. On or about the dates listed below, in the State and Eastern District of Wisconsin,

ANGELA M. JUST

did willfully and knowingly embezzle, steal, and convert to her use more than \$1,000 of money of the SSA; namely, widow's benefits for her deceased mother, P.J., to which she knew she was not entitled.

Count	Date	Amount
Seven	August 17, 2016	\$900
Eight	March 15, 2017	\$900
Nine	August 15, 2018	\$900

All in violation of Title 18, United States Code, Section 641.

FORFEITURE NOTICE

13. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1343, set forth in Counts One through Three of this indictment, and in violation of Title 18, United States Code, Section 641, set forth in Counts Four through Nine, the defendant, Angela M. Just, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to a sum of money equal to the proceeds derived from the offenses.

14. If any of the property described above, as a result of any act or omission by the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:



FOREPERSON

Date: 7/16/19


MATTHEW D. KRUEGER
United States Attorney